

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re : Chapter 13
JOHN P. KERR : Case No. 23-13335 (PMM)
Debtor. :
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**ENTRY OF APPEARANCE OF THE CITY OF PHILADELPHIA
COMBINED WITH DEMAND FOR SERVICE OF PAPERS**

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly enter the appearance of PAMELA ELCHERT THURMOND, Esquire as
counsel of record for creditor The City of Philadelphia and/or Water Revenue Bureau,
where applicable, in the above-captioned matter.

PLEASE TAKE NOTICE that the City of Philadelphia and/or Water Revenue Bureau, (the “City”), a creditor and party-in-interest in the above-captioned case, hereby appears in the above-captioned case by its counsel, Pamela Elchert Thurmond, Senior Attorney; such counsel hereby enters their appearance pursuant to Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”) and Fed. R. Bankr. P. 9010 (b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007 and § 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the captioned case and served upon the City and to the attorney at the address and telephone number set forth below.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Creditor's rights: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) to trial by jury

in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Creditor is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: May 15, 2024

By: /s/ Pamela Elchert Thurmond
PAMELA ELCHERT THURMOND
Senior Attorney
PA Attorney I.D. 202054
Attorney for the City of Philadelphia
and/or
Water Revenue Bureau
City of Philadelphia Law Department
Municipal Services Building
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Entry of Appearance of the City of Philadelphia was served by the means designated below, on the date set forth below, upon the following parties:

Debtor's Counsel:

The Law Offices of Anthony A. Frigo
C/O Anthony A. Frigo, Esquire
175 Strafford Avenue, Suite One
Wayne, PA 19468

Chapter 13 Trustee:

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street, Suite 1813
Philadelphia, PA 19107

Via regular mail

John P. Kerr
430 Ashley Drive
Hatboro, PA 19040

Respectfully submitted,

Date: May 15, 2024

By: /s/ Pamela Elchert Thurmond
PAMELA ELCHERT THURMOND
Senior Attorney
PA Attorney I.D. 202054
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